

ROTHENBERG LAW

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BY EMAIL ONLY [dawn_samuel@nywd.uscourts.gov]

Hon. Elizabeth A. Wolford
United States District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, New York 14614

Re: United States v. Alexander Green, et ano.
14-cr-6038

Dear Judge Wolford:

I am writing, with no small degree of trepidation, to request a brief adjournment of sentencing—one that will not interfere with the court's schedule for sentencing co-defendants in this case.

First of all, I am now scheduled to start a lengthy commercial trial in Supreme Court on March 12. My guess is that the trial will last three weeks. Not only does the sentencing fall within the middle of that trial, but preparation for sentencing will be extremely difficult while I am engaged in that matter. Secondly, we are in the process of obtaining materials from recently-identified treatment providers in Alex Green's background, in response to questions that arose in the PSR, or to fill in gaps in his history, and we need a little more time to finish that process.

We believe that if we are granted a three-week adjournment, we will have enough time to obtain this additional important background information, and provide the same to Probation Officer Sarah Whitcomb, and Your Honor, in sufficient time before sentencing. In that regard, we would also request a concomitant adjournment of the other deadlines in Your Honor's Sentencing Guideline Order. Lastly, I note that a three-week adjournment will not delay the sentencing of any of the other defendants who are scheduled to be sentenced in April.

I have contacted the government in advance of this request; the government does not consent to this request for adjournment.

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Thank you very much for your consideration of this request.

Respectfully,

David Rothenberg

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DR/be

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